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December 8, 2017

BY ECF:

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Percoco, et al., S2 16 Cr. 776 (VEC)

Dear Judge Caproni:

We represent Peter Galbraith Kelly, Jr. in the above-referenced matter. We write on behalf of Mr. Kelly and his co-defendants Joseph Percoco, Steven Aiello, and Joseph Gerardi.

Pursuant to the Court's order dated November 27, 2017 (Doc. No. 366) and consistent with Your Honor's practice in United States v. Silver, the defense is jointly submitting the following proposals: (1) preliminary jury instructions, (2) final jury instructions, (3) a written juror questionnaire, and (4) oral voir dire questions.

Respectfully submitted,

LANKLER SIFFERT & WOHL LLP

By: /s/ Daniel M. Gitner
Daniel M. Gitner
Jun Xiang
Rachel S. Berkowitz

CC:

All Counsel (via ECF)